

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

UNITED STATES)	
)	
)	
v.)	No. 21-CR-00143
)	
)	
VICTOR HILL,)	
)	
Defendant.)	

**SHERIFF VICTOR HILL'S JOINT MOTION REQUESTING THE USE OF A
JURY QUESTIONNAIRE**

COMES NOW, Sheriff Victor Hill, by and through undersigned counsel and files this Joint Motion for the Use of a Jury Questionnaire pursuant to Rule 24 of the Federal Rules of Criminal Procedure. In support thereof, Sheriff Hill shows as follows:

1.

This case has received a fair amount of media coverage since its inception. It is likely that some individuals in the potential juror pool will have prior knowledge of the allegations and individuals associated with the case. The ability to parse out those potential jurors so that they don't taint the rest of the pool will add to the fairness and efficiency of the voir dire process. Further, the ability to receive information regarding the potential jurors' opinions of certain

topics through the administration of a questionnaire will greatly help all parties effectively and efficiently streamline and target their individual questions.

2.

Undersigned counsel has conferred with counsel for the government and all parties are in agreement with this request for a questionnaire. The parties' intent is to submit to the Court a joint questionnaire and indicate through objections if there are any questions that either party would like to propose and is not agreed upon by the opposing party.

3.

Sheriff Hill respectfully proposes the following jury selection procedure:

- 1) that the Court allow the use of a jury questionnaire;
- 2) that the Court bring the potential jurors in on Thursday, October 6, 2022, provide them the proposed jury questionnaire, have them complete the document and return the questionnaire to the Court;
- 3) permit the parties to receive un-redacted versions of the questionnaires under seal as soon as practicable, so that the parties may review them; and
- 4) have the potential jurors return to the Court on the first day of jury selection, Wednesday, October 12, 2022 and allow the parties to conduct follow-up questioning of the jurors as necessary.

CONCLUSION

Sheriff Hill respectfully requests that the Court grant this Joint Motion and permit the use of a jury questionnaire to the prospective jurors in this case.

This 30th day of August, 2022.

Respectfully submitted,

By: /s/ *Marissa Goldberg*
Marissa Goldberg

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CERTIFICATE OF SERVICE

I hereby certify that on the below date I electronically filed the foregoing Joint Motion for the Use of a Jury Questionnaire with the Clerk of Court using CM/ECF system which will automatically send email notification of such filing to the to the following attorneys of record:

Brent Gray, AUSA
Bret Hobson, AUSA
U.S. Attorney's Office
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75 Ted Turner Drive SW
Atlanta, GA 30303

This 30th day of August, 2022

/s/ Marissa Goldberg

By: Marissa Goldberg
Ga. Bar No. 672798

Attorney for Sheriff Victor Hill